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July 18, 2023

By ECF

Hon. Kevin McNulty, U.S.D.J.  
United States District Court  
District of New Jersey  
50 Walnut Street  
Newark, New Jersey 07102

Re: *Industria de Alimentos Zenú S.A.S. v. Latinfood U.S. Corp. d/b/a Zenú Prods. Co., et al.*,  
Civil Action No. 2:16-cv-6576-KM-MAH

Dear Judge McNulty:

We represent the Plaintiff/Counter Defendant Industria de Alimentos Zenú S.A.S. ("Plaintiff") and Third Party Defendant Cordialsa USA, Inc. We respectfully submit this letter application for an adjournment by automatic extension of the original motion day to the next available motion day with respect to two (2) pending motions filed by Defendants Latinfood U.S. Corp. and Wilson Zuluaga ("Defendants"): (i) a Motion for Reconsideration of Portions of the Court's Opinion and Order of June 27, 2023 ("Reconsideration Motion") [D.E. 302]; and (ii) a Motion for a Stay of the Cancellation of Latinfood's Zenú Mark and a Stay of the Injunction on Latinfood from Using the Zenú and Ranchera Marks ("Stay Motion") [D.E. 303].

Defendants noticed both the Reconsideration Motion and the Stay Motion for the August 7, 2023 motion day. The originally noticed motion day on each Motion has not previously been extended or adjourned. In accordance with Local Civil Rule 7.1(d)(5), Plaintiff respectfully requests an automatic extension of the originally noticed August 7, 2023 motion day to the next available motion day, which falls on **August 21, 2023**.

We thank the Court for its attention to this matter.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read 'Stella L. Sainty', written over the typed name.

Stella L. Sainty

cc: All counsel of record (via ECF)